

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NICHOLAS MARTIN, on behalf of himself and
others similarly situated,

Plaintiff,

v.

CREDIT PROTECTION ASSOCIATION, LP,

Defendant.

Case 1:11-cv-6828

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Defendant, CREDIT PROTECTION ASSOCIATION, LP, by its attorneys David M. Schultz and Justin M. Penn, and pursuant to Federal Rule of Civil Procedure 6(b), respectfully requests that this court grant it a 21 day enlargement of time to file its responsive pleading to plaintiff's Complaint – Class Action, and in support thereof, states as follows:

1. Plaintiff's Complaint purports to state a class action claim under the Telephone Consumer Protection Act against the defendant.
2. Plaintiff's Complaint was filed on September 28, 2011, and defendant was served on October 5, 2011. Defendant's responsive pleading is due on October 26, 2011.
3. Defendant respectfully requests an additional 21 days in which to file a responsive pleading.
4. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.
5. Counsel for defendant spoke with counsel for the plaintiff who indicated that there is no objection to the instant request.

WHEREFORE, defendant, CREDIT PROTECTION ASSOCIATION, LP, respectfully requests this court grant it an enlargement of time up to and including November 16, 2011, to file an answer or to otherwise plead to plaintiff's Complaint.

Respectfully submitted,

CREDIT PROTECTION ASSOCIATION, LP

By: /s/Justin M. Penn

One of its Attorneys

Justin M. Penn

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CERTIFICATE OF SERVICE

I, an attorney, hereby certify that on October 26, 2011 I electronically filed Defendant's Unopposed Motion for Enlargement with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/Justin M. Penn

Justin M. Penn